

**Health and Safety Audit
(29 CFR 1910.120)
EPA Region X, Emergency Response Unit**

Date: June 19, 2013_____

Site Name/Location: Avery Landing/46213 St. Joe River Road; Avery, ID 83802; Shoshone County

Brief Site Description: Soil Removal at a site of a former railroad maintenance and refueling facility. The soil is contaminated with petroleum product which had been day-lighting onto the St. Joe River._____

OSC: _Earl Liverman_____

H&S Auditor:

Andy Smith; PE, CHMM – (OSC) Health and Safety Program Contact

Overview comments: This is a PRP-lead removal. It is a continuation of EPA-lead site that is not on property belonging to Potlatch Land and Lumber LLC. On site are two contractors for the PRP: Geo Engineers and Pacific Pile & Marine. Geo Engineers plays a role similar to START and PP&M plays a role similar to ERRS. Also on site representing EPA is EnE.

A brief cover HASP was written to integrate the HASPs for Potlatch, GeoEngineering, and Pacific Pile & Marine (PPM). The introduction in the Integrated HASP in Appendix D captures nicely how the HASPs are come together. The Integrated HASP defers to Potlatch contractors who will be actively working on site for their respective HASPs to provide more robust site-specific details.

Potlatch does not anticipate their personnel will need to enter the exclusion zone. While this precludes Potlatch from HAZWOPER requirements for a HASP, one was written for Potlatch employees in any case.

EPA and START are on-site twice a week and are not actively working inside the exclusion zone.

The audit questions on the HASP elements involve reviewing the three HASPs and ensuring consistency and coordination among the three where applicable.

❖ **Health and Safety Plan (HASP)**

- **Is there a HASP available on-site?** _Yes_____
- **Has the OSC reviewed and signed off/approved the HASP?** N/A This is PRP-lead. As such the OSC recognizes this as the HASP for this site._____
- **Have all workers on site read and signed off on the plan?** Yes. See Form C-2 for GeoEngineers. See Certificate of Receipt and Compliance for Pacific Pile & Marine._
- **Has there been a health and safety audit conducted on site?** No_____
- **If so by whom/what affiliation?** _N/A_____
- **Have all identified deficiencies been corrected?** _N/A_____

❖ **Does the HASP include an organizational structure showing chain of command with function and responsibilities of [(b)(1)(ii)(A) and (2)(i)(...)]?:?** _Yes, _p. 25 of Removal Action Work Plan; Append D, p. D-6; Attach D-2, p. 6; Attach D-3, p.4_____

- **Supervisor? [(A)]** ___ Yes_____
- **Safety Officer? [(B)]** _Yes_____
- **All other personnel? [(C)]** _____

❖ **Is there a comprehensive work plan with details of [(b)(1)(ii)(B) and (3)(...)]:**

- **Cleanup activities and standard operating procedures [i]?** _Yes, they are following a Removal Action Work Plan May 13, 2013_____
- **Defines work tasks and objectives and methods for accomplishing them [ii]?**
_Yes_____
- **Personnel requirements (i.e., personnel needed) for implementing [iii]?**
_Yes_____
- **Provides for implementation of HAZWOPER training requirements [iv]?** Yes.
Attach D-3, p. 16
- **Provides for implementation of informational program on nature, level, and degree of exposure likely from work at site [v]?** Yes. See Form C-1.
- **Provides for implementation of medical surveillance program [vi]?** GeoEngineers has determined their employees are not subject to OSHA 1910.120(f)(2); _____

❖ **Site Specific Safety Plan [(b)(1)(ii)(C) and (4)(...)]:**

- **Has a risk/hazard analysis been completed for each site task and operation [(ii)(A)]?**
Yes Attach D-1, p. 6; Attach D-3, p. 23_____
- **Does Plan ensure employees are assigned to tasks and operations that are consistent to level of HAZWOPER training (i.e., 24 and-, 40-hour) [(ii)(B)]?**
 - **Have all employees received 40 hour HAZWOPER training [(4)(ii)(B)]?** Yes____
 - **Is documentation available on site?** _Yes_____
 - **Are all employees current on their 8-hour refresher training?** _Yes_____
 - **Have supervisors or on-site management received an additional 8 hours of specialized training at the time of job assignment?** _ This was not confirmed._
- **Does Plan address PPE for each task and operation and is consistent with PPE Program [(ii)(C) reference (G)(5)]? – Yes, Attach D-2, p. 21**
 - **Are employees trained in use of PPE? – Level-D PPE usage.**
 - **PPE selection based upon site hazards?**
 - **PPE use and limitations of the equipment?**
 - **Work mission duration?**
 - **PPE maintenance and storage?**
 - **PPE decontamination and disposal?**
 - **PPE training and proper fitting?**
 - **PPE donning and doffing procedures?**
 - **PPE inspection procedures prior to, during, and after use?**
 - **Evaluation of the effectiveness of the PPE program?**
 - **Limitations during temperature extremes, heat stress, and other appropriate medical considerations?**
- **Does Plan address Medical Surveillance requirements (i.e., a statement to that effect) [(ii)(D), see also (f)]? Yes.**
- **Does the Plan address air monitoring, personnel monitoring, and environmental sampling techniques and instruments to be used, including calibration of such instruments [(ii)(E) see also section (h)]? Yes.**
- **Does the Plan address site control measures [(ii)(F) references (d)(3)]?**
 - **Is there a map in the Site-Specific Safety and Health Plan [(d)(3)]?** _Yes, Attach D-1_____
 - **Have work zones been defined [(d)(3)]?** _Yes_____

- Is there a buddy system in place [(d)(3)]? Yes_____
- Have site communications been established [(d)(3)]? Yes_____
- Has a route to the nearest hospital been defined and explained to the crew [(d)(3)]?_Yes_____
- Are there written Decon procedures [(ii)(G) references (k)]? Yes_____
 - Has it been communicated to employees and is it being implemented [(k)(2)(i)]?
 - Has an SOP been established to minimize contact with hazardous substances and contaminated equipment [(k)(2)(ii)]?
 - Is a procedure in place for deconning personnel and equipment [(k)(2)(iii)]?
 - Is Safety Officer monitoring decontamination procedure for effectiveness [(k)(2)(iv)]?
 - Is decon location protective to uncontaminated personnel and equipment [(k)(3)]?
 - Is equipment used for decontaminating properly decontaminated itself or properly disposed of along with any decon solutions [(k)(4)]?
 - Is PPE properly decontaminated or disposed of [(k)(5)]?
 - Does SOP require that when PPE clothing becomes wetted with hazardous substance to immediately decon and shower [(k)(5)]?
 - Does SOP require only authorized personnel to remove PPE clothing and equipment from change room [(k)(6)]?
 - If commercial establishments are deconing PPE clothing and equipment, have they been informed of potential harmful effects due to exposure to hazardous substances [(k)(7)]?
 - Are showers and change rooms required by the decontamination procedures and do they meet the requirements of 29 CFR 1910.141 [(k)(8)]?
- Is there an emergency response plan [(ii)(H) references (l)]?

Does it discuss: Yes

 - Pre-emergency planning [(2)(i)]?_____
 - Personnel role, lines of authority, and communication [(2)(ii)]?
 - Emergency recognition and prevention [(2)(iii)]?
 - Safe distances and places of refuge [(2)(iv)]?
 - Site security and control [(2)(v)]?
 - Evacuation routes and procedures [(2)(vi)]?
 - Decontamination procedures which are not already covered (ii)(G) [(2)(vii)]?
 - Emergency medical treatment and first aid [(2)(viii)]?
 - Who on site has first aid/CPR (not required unless emergency medical treatment is not readily available)?
 - Emergency alerting and response procedures [(2)(ix)]?
 - Critique of response and follow-up [(2)(x)]?

- PPE and emergency equipment [(2)(xi)]?
- Site topography, layout, and prevailing weather conditions [(3)(i)(A)]?
- Procedures for reporting to local, state, and federal agencies [(3)(i)(B)]?

Is the emergency response plan consistent with the following requirements?:

- It is a separate section of the Site Safety and Health Plan [(3)(ii)]
- It is compatible and integrated with the disaster, fire and/or emergency response plans of local, state, and federal agencies [(3)(iii)]
- It has been rehearsed regularly as part of the overall training program for site operations [(3)(iv)]
- It has been reviewed periodically and, as necessary, amended to keep it current with new or changing site conditions or information [(3)(v)]
- An employee alarm system has been installed in accordance with 29 CFR 1910.165 to notify employees of an emergency situation; to stop work activities if necessary; to lower background noise in order to speed communication; and to begin emergency procedures [(3)(vi)]
- It allows, based upon the information available at time of the emergency, the employer to evaluate the incident and the site response capabilities and proceed with the appropriate steps to implement the site emergency response plan [(3)(vii)]?

- Are there confined space entry procedures [(ii)(i)]? Yes, mention that confined space procedures will go into effect if a confined space situation is encountered.
 - Have any confined entry situations been identified? No
- Is there a spill containment program [(ii)(j) references (J)]?
 - Is fuel containers inside a containment area? Insure after heavy rain that containment area is empty of rain water. Yes

❖ Other issues to watch for

- Is sanitation addressed [e.g., hand washing and toilets]? Yes _____
- Has the local fire department been informed of site operations [Do this if dealing with a situation which might warrant calling fire department, e.g, explosive or flammable material]? n/a, _____
- Has the local hospital been contacted [Do this if dealing with a unique substance that would require further preparation by hospital, e.g., nerve agent, cyanide]? n/a _____
- Are there compressed gas cylinders on site and are they handled appropriately?
 - ___ None seen, however this was not confirmed. _Discussion provided in HASP on proper use of gas cylinders. _____
- Is there a welding operation on site? No _____

- **Is any type of air sampling equipment on site?** Air exposure is not a serious issue at this site. Nevertheless, the HASP addresses air sampling, action levels, and calibration.
- **Is it maintained and current on all calibrations?** Not confirmed. _____
- **Is there an XRF on site?** No _____
 - **Is all the paperwork with the XRF current?** _____
 - **Is the XRF kept in a secure location when not in use?** _____
- **Is heat or cold stress an issue?** Not at time of visit _____
- **Is fluid replacement available on site?** Yes _____
- **Are any flammable materials on site stored appropriately?** Yes _____
- **Is a lock out tag out program required?** No _____
- **Is an injury log maintained on site?** _ This was not confirmed. _____
- **Are fire extinguishers located in the office, on site, in equipment and are they maintained?** This was not confirmed. _____
- ❖ **Other Comments:** _____

The EPA Hotline telephone number (800-621-8431) is for EPA Region 5 and not applicable to this site. See Attach D-3, p. 11 _____

- ❖ **Summary of Audit Results:** The HASP was well written and did a good job integrating the HASP of three entities. The only issue observed was a worker eating within the exclusion zone. It is challenging at HAZWOPER sites where work is conducted in level-D PPE and takes on the appearance of a construction site, to impress upon the workers the importance to continue to practice good HAZWOPER procedures.